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SIX4THREE, LLC, a Delaware
limited liability company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SIX4THREE, LLC, a Delaware limited
liability company,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation
and DOES 1 through 50, inclusive

Defendants.

Case No. 3:17-cv-00359-WHA

ADMINISTRATIVE MOTION TO FILE
UNDER SEAL

Date: February 16, 2017

Time: 8:00AM

Ctrm: 8

Judge: Honorable William H. Alsup

1 Pursuant to Local Rules 7-11 and 79-5, plaintiff Six4Three LLC (“643”) hereby
2 respectfully moves the Court for an Order sealing Exhibits 3 through 19 of the Declaration of
3 David S. Godkin in Support of Plaintiff’s Reply to Defendant’s Opposition to Plaintiff’s
4 Motion to Remand and portions of the reply memorandum referring to these exhibits.

5 Exhibits 4 through 19 are emails that Defendant Facebook, Inc. (“Facebook”) has
6 designated “Confidential” pursuant to the Section 2 of the Protective Order entered into in the
7 state court case by Judge Jonathan Karesh of the San Mateo Superior Court on October 25,
8 2016. Exhibit 3 is a letter from 643’s counsel to Facebook’s counsel on January 10, 2017
9 summarizing 643’s review of discovery to date and summarizing the basis for its Motion to
10 Compel production of documents in the custody of key Facebook executives. Exhibit 3
11 references portions of and characterizes documents that Facebook designated “Confidential”
12 under the Protective Order.
13

14 For the foregoing reasons, the Court should grant this motion and enter the [Proposed]
15 Order sealing Exhibits 3 through 19 of the Declaration of David S. Godkin in Support of
16 Plaintiff’s Reply to Defendant’s Opposition to Plaintiff’s Motion to Remand and portions of the
17 reply memorandum referring to these exhibits.
18

19 Dated: February 9, 2017

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BIRNBAUM & GODKIN, LLP

22 By: /s/ David S. Godkin

23 Basil P. Fthenakis

24 David S. Godkin

James E. Kruzer

Attorneys for Plaintiff

Six4Three, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury under the laws of the State of California, that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: February 9, 2017

By: /s/ David S. Godkin
David S. Godkin